

COMMENTS OF General Walter Kross

I have just recently become aware of this proposed amendment to FCC Part 15 and am writing this to express my personal support of Commission Rules to permit broader data transmission capabilities for unlicensed devices. As past Commander-in-Chief of DOD's U.S. Transportation Command and in my current position of Strategic Advisor to SAVI Technologies, I am fully aware of the risks currently facing the security of our nation. This initiative will not only benefit flow of commerce but, in light of this past year's exposure of weaknesses in our homeland security, it will significantly improve our visibility of what is being imported through our sea ports.

The RFID systems that will be able to take advantage of this modification will allow users of the technology to access greater amounts of data on tags in a timely manner. This allows the full capability of RFID systems to be used to provide complete visibility of the container contents and location when required. Without this modification, visibility of container contents could significantly stifle the flow of commerce through our ports.

The expanded capability afforded by use of a longer duty cycle increases the efficiency and speed in handling the material through our ports while providing needed visibility of container contents. The faster, better and increased security that this change facilitates will benefit the entire U.S. supply chain processes.

In summary I would like to express that I fully support the proposed modification for increased duty cycle capabilities.